

KML LAW GROUP, P.C.
A PROFESSIONAL CORPORATION INCORPORATED IN PENNSYLVANIA
701 Market Street, Suite 5000
Philadelphia, PA 19106
(215) 627-1322
www.kmlawgroup.com

August 15, 2023

The Honorable Michael B. Kaplan, U.S.B.J.
Courtroom #8
402 East State Street
Trenton, NJ 08608

RE: Lois Joanne Anderson
Case No. 21-17593-MBK
Premises: 336 Eastern Blvd., Bayville, NJ 08721
Secured Creditor: Rocket Mortgage, LLC f/k/a Quicken Loans, LLC f/k/a Quicken Loans Inc.

Dear Judge Kaplan,

This office represents Rocket Mortgage, LLC f/k/a Quicken Loans, LLC f/k/a Quicken Loans Inc. (“Secured Creditor”), holder of a mortgage on real property located at 336 Eastern Blvd., Bayville, NJ 08721. Please accept this letter in response to Debtor’s motion to sell the subject property.

Secured Creditor has reviewed the current motion to sell and the proposed form of order filed with the Court. Secured Creditor does not object to the motion or the proposed order in its current form. However, should the proposed order be revised, or if the underlying facts supporting the motion should change, including but not limited to the purchase price, Secured Creditor reserves its right to object to the motion.

The Debtor is required to request an updated formal payoff prior to closing to ensure the loan is paid in full in accordance with the terms of the note, mortgage and applicable state laws. Secured Creditor’s response, in its present form, is not an objection to the current motion to sell the subject property. The undersigned does not intend to appear to prosecute an objection at this

time unless the proposed order is amended to a form deemed objectionable.

Respectfully,
KML LAW GROUP, P.C.

/s/ Denise Carlon
Denise Carlon, Esquire
dcarlon@kmllawgroup.com
Attorney for Secured Creditor

KML Law Group, P.C.
By: Denise Carlon Esquire
701 Market Street, Suite 5000
Philadelphia, PA 19106
201-549-2363
Attorneys for Secured Creditor: Rocket
Mortgage, LLC f/k/a Quicken Loans, LLC

In Re:
Lois Joanne Anderson
Debtor

Case No: 21-17593 MBK
Chapter: 13
Judge: Michael B. Kaplan

CERTIFICATION OF SERVICE

1. I, Patricia Rychards:

Represent the _____ in the above-captioned matter.

am the secretary/paralegal for Denise Carlon, who represents the Secured Creditor in the above captioned matter.

am the _____ in the above case and am representing myself.

2. On 08/14/2023, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:

- Response to Motion to Sell
- Certification of Service

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: 08/14/2023

/s/ Patricia Rychards

Name and Address of Party Served	Relation of Party to the Case	Mode of Service
Lois Joanne Anderson 336 Eastern Boulevard Bayville, NJ 08721-2925	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court *)
MaryBeth Schroeder 802 Main Street Unit 2A Toms River, NJ 08753	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court *)
Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853	Chapter 13 Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court *)